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BY ECF

Honorable Robert M. Levy
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Jemal Earle v. City of New York, et al., 16-cv-0171 (SJ)(RML)

Your Honor:

I am an Assistant Corporation Counsel assigned to the defense of this matter on behalf of defendants. I write jointly on behalf of plaintiff and defendants to request an extension of the deadline by which discovery must be completed of sixty (60) days, from today, June 28, 2017 to August 25, 2017. This is the third request for an extension of the discovery deadline. Both prior requests were granted. The reason for this request is that there remain a number of depositions of the defendants outstanding, which the parties have been unable to schedule to this point. Moreover, counsel for plaintiff has informed the undersigned that she is on trial beginning on August 7, 2017.

Additionally, the process to determine the City's settlement position took more time that counsel had anticipated at the last court conference. Finally, the production of a number of disciplinary records which the Court ordered at the last conference took longer than anticipated. The parties believe that all of the outstanding paper discovery has now been completed and believe that the remaining depositions can be conducted during the proposed extension.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Angharad Wilson
Assistant Corporation Counsel

cc: Baree Fett, Esq. (via ECF)
Jeffrey I. Weiner, Esq. (via ECF)
Attorney for Plaintiff